

XAVIER GONZALES, ESQ.
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Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

-) Case No.:
-) 2:16-cr-00006-JCM-PAL-1
-)
-) **DEFENDANT'S UNOPPOSED**
-) **MOTION FOR ENLARGEMENT**
-) **OF TIME TO FILE REPLY TO**
-) **GOVERNMENT'S RESPONSE TO**
-) **DEFENDANT'S MOTION FOR**
-) **ORDER OF DISMISSAL**
-) **FRCP 6(b)(1)(A)**
-)

Plaintiff,

-vs-

GUSTAVO VILLA GARCIA

Defendants.

Comes now, RICARDO BRAVO-BRAVO, by and through his Attorney, XAVIER GONZALES, ESQ. hereby files a MOTION FOR ENLARGEMENT OF TIME to file it's Reply to the Government's Response to Defendant's Motion For Order Of Dismissal, filed with the Court on August 8th 2016. Defendant's response to the Government's filing is due one or before August 14th 2016.

This motion is made and based upon Federal Rule of Civil Procedure FRCP 6, no previous request for an extension has been requested.

Respectfully submitted this 13th of Augsut, 2016.

By: /s/ Xavier Gonzales, Esq.

XAVIER GONZALES, ESQ.
Attorney for Defendant

1 In support of the instant Motion, the Plaintiff submits the following:

2 1. The Government's Response to Defendant's Motion For Order of Dismissal was
3 filed with the Court on August 8th 2016.

4 2. On August 8th 2016, the legal staff for undersigned Counsel contacted Kathryn
5 Newman, Counsel for the Government, advising her that we had received their
6 response to the Motion For Order of Dismissal, and further notified that
7 undersigned Counsel was out of the jurisdiction. Since the issues in the matter
8 are significantly complex and require a thorough review of the facts and law, that
9 additional time is being requested for thorough review upon undersigned
10 Counsel's return.

11 3. I advised of the need for one (1) additional week to respond to the Government's
12 Response to Defendant's Motion For Order of Dismissal. Defendant's response
13 is currently due on or before August 14th 2016.

14 4. Kathryn Newman, Assistant United States Attorney, stated on August 8th 2016
15 that she had not objection to Plaintiff's Motion for an Enlargement of Time of one
16 week.

17 Therefore, it is hereby requested an additional week from today's date, preferably on
18 or before August 22nd 2016, to file a reply. This Motion is made in good faith and not for the
19 purposes of delay, and it is believed neither party is prejudiced by the instant request for
20 enlargement of time.

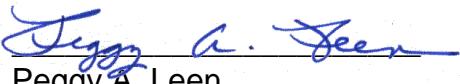
21 24 Respectfully submitted this 13th day of August, 2016.

22 25 IT IS SO ORDERED this 19th
26 day of August, 2016.

27 28 By: /s/ Xavier Gonzales, Esq.

XAVIER GONZALES, ESQ.

Attorney for Defendant


27 28 Peggy A. Leen
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of XAVIER GONZALES, ESQ., and that I served the foregoing **MOTION FOR ENLARGEMENT OF TIME** by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order, this 13th of August to the following party:

DANIEL G. BOGDEN
United States Attorney District of Nevada
KATHRYN C. NEWMAN
Assistant United States Attorney
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501 Las Vegas Boulevard South, Suite 11000
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kathryn.newman@usdoj.gov
Counsel for Plaintiff United States

By: /s/ Liliana Mier
An Employee of XAVIER GONZALES, ESQ.